

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

Perry McCants : NO. 21-13336-amc

OBJECTION TO CERTIFICATE OF DEFAULT AND CERTIFICATE OF SERVICE

Debtor, by counsel, objects to the certificate of default and requests the Court not enter a relief order due to the following:

The Debtor has received a loan modification from the mortgage company and objects to certificate of default as a basis for relief.

/s/David M. Offen
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A copy of this Objection is being served on DANIEL P. JONES, Esquire and the Chapter 13 Trustee.

/s/ David M. Offen
David M. Offens
Attorney for Debtor